

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

NAIAD MARITIME CO., *

Plaintiff, *

v. * Civil Action No. 16-cv-4006-RDB

PACIFIC GULF SHIPPING COMPANY, * **IN ADMIRALTY**

et al., *

Defendants and Garnishee. *

* * * * *

**MOTION FOR ISSUANCE OF REQUEST FOR
INTERNATIONAL JUDICIAL ASSISTANCE TO
MARSHALL ISLANDS AND PAKISTAN**

Plaintiff Naiad Maritime Co. (“Naiad”) seeks an Order granting the issuance of Letters of Request directed to the appropriate judicial authorities in the Republic of Marshall Islands and in Pakistan for orders directing Defendant Pacific Gulf Shipping Co Ltd. (“PGSC-Marshall Islands”) and Kopak Shipping Company (“Kopak”), respectively, to answer interrogatories; to produce documents that are in their possession, custody, or control; and to appear for depositions regarding those records. As set forth in the accompanying Memorandum of Law, issuance of Letters of Request is soundly within this Court’s authority and good cause exists for issuance of the same. The proposed Letters of Request also accompany this filing.

WHEREFORE, for the reasons set forth in the accompanying Memorandum of Law, Naiad requests that the Court issue the Letters of Request.

Dated: February 5, 2017

/s/ Marios J. Monopolis
J. Stephen Simms (#4269)
Marios J. Monopolis (#29177)
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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2017, a copy of the foregoing was filed on the Court's CM/ECF system for service on all counsel of record.

/s/ Marios J. Monopolis